

JOSHUA P. GILMORE
Nevada Bar No. 11576
REBECCA L. CROOKER
Nevada Bar No. 15202
BAILEY ♦ KENNEDY
8984 Spanish Ridge Avenue
Las Vegas, Nevada 89148-1302
Telephone: 702.562.8820
Facsimile: 702.562.8821
JGilmore@BaileyKennedy.com
RCrooker@BaileyKennedy.com

Attorneys for Defendants
SHAC, LLC d/b/a SAPPHIRE
GENTLEMEN'S CLUB; and SHAC MT, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CIELO JEAN “CJ” GIBSON, EMMA GLOVER,
JULIANNE KLAREN, LINA POSADA,
MELANIE IGLESIAS, SANDRA VALENCIA,
and VIDA GUERRA,

Plaintiffs,

vs.

SHAC, LLC d/b/a SAPPHIRE GENTLEMEN’S
CLUB; SHAC MT, LLC; EVAN ZAPPOLA
d/b/a VEGAS VIP KING,

Defendants.

Case No. 2:21-CV-01160-JCM-VCF

**STIPULATION TO EXTEND
DEADLINE FOR REPLY IN SUPPORT
OF MOTION TO DISMISS**

(First Request)

Pursuant to LR IA-6-1, Plaintiffs Cielo Jean “CJ” Gibson, Emma Glover, Julianne Klaren, Lina Posada, Melanie Iglesias, Sandra Valencia, and Vida Guerra (collectively, “Plaintiffs”), by and through their counsel, and Defendants SHAC, LLC d/b/a Sapphire Gentlemen’s Club and SHAC MT, LLC (together, the “SHAC Parties”), by and through their counsel, stipulate and agree as follows:

1. On June 17, 2021, Plaintiffs filed their Complaint (ECF No. 1);
2. On July 13, 2021, the SHAC Parties (through their counsel) executed Waivers of Service of Summons forms pursuant to Fed. R. Civ. P. 4(d) (ECF Nos. 5-6);
3. On November 12, 2021, Plaintiffs filed their First Amended Complaint (ECF No. 11), adding Evan Zappola d/b/a Vegas VIP King as an additional Defendant;

1 4. Plaintiffs are in the process of attempting service of the Summons and First Amended
2 Complaint on Mr. Zappola;

3 5. On November 29, 2021, Plaintiffs and the SHAC Parties submitted, and this Court
4 approved, a Stipulation to give the SHAC Parties additional time to respond to the First Amended
5 Complaint (ECF Nos. 13-14);

6 6. On December 13, 2021, the SHAC Parties filed a Motion to Dismiss the First
7 Amended Complaint (the “Motion to Dismiss”) (ECF No. 15);

8 7. On December 22, 2021, Plaintiffs and the SHAC Parties submitted, and this Court
9 approved, a Stipulation to give Plaintiffs additional time to respond to the Motion to Dismiss (ECF
10 Nos. 17-18);

11 8. On January 17, 2022, Plaintiffs filed their Response in Opposition to the Motion to
12 Dismiss (ECF No. 19);

13 9. Due to scheduling conflicts for the SHAC Parties’ counsel, the time for the SHAC
14 Parties to file their Reply in Support of the Motion to Dismiss shall be extended from January 24,
15 2022, to February 11, 2022; and

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10. This is the first stipulation for an extension of time for the SHAC Parties to file their Reply in Support of the Motion to Dismiss, and is sought in good faith and not for purposes of delay.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 19th day of January, 2022.

ALVERSON TAYLOR & SANDERS

By: /s/ David M. Sexton
KURT R. BONDS (Nv. Bar No. 6228)
DAVID M. SEXTON (Nv. Bar No. 14951)
6605 Grand Montecito Pkwy, Ste. 200
Las Vegas, NV 89149

Attorneys for Plaintiffs

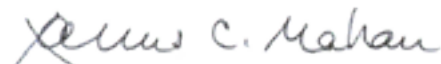
DATED this 19th day of January, 2022.

BAILEY ♦ KENNEDY

By: /s/ Joshua P. Gilmore
JOSHUA P. GILMORE
REBECCA L. CROOKER

*Attorneys for Defendants, SHAC, LLC
d/b/a SAPPHIRE GENTLEMEN'S
CLUB; and SHAC MT, LLC*

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED: January 21, 2022